

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:) CASE NO. 12-61280-rk
)
Christopher Frank Paxos) CHAPTER 11
)
) Judge Russ Kendig
)
Debtor(s).) LIMITED OBJECTION TO
) CONFIRMATION OF DEBTORS'
) CHAPTER 13 PLAN

Now comes The Huntington National Bank (“Creditor” and “HNB”), by and through counsel, and states that it objects to Confirmation of Chapter 13 Plan (“Plan”) filed by the above-captioned debtor(s) (“Debtors”) for the following reason(s):

1. The Creditor is the holder of a Personal Loan Agreement (“Note”) and a perfected security interest in the 2006 Porsche Cayenne, VIN# WP1AC29P26LA90507.
2. There remains due and owing on the Note the sum of \$7,183.23, which does not reflect attorney fees and costs associated with this Bankruptcy filing.
3. The Third Amended Plan, Document Number 151, (“Plan”) states: “HNB has a claim secured by the Debtor’s motor vehicle. HNB will retain its lien and the Debtor will make all payments when due to HNB ...”
4. The Note matured on January 25, 2011 causing the entire balance to become due-and-owing.

5. The Creditor requests clarification to the language in the Plan on whether a lump sum payment is forthcoming or if the Debtor is proposing to extend out the contract past the maturity date.

WHEREFORE, The Huntington National Bank prays this Court deny Confirmation of Debtors' Chapter 13 Plan.

Respectfully submitted,

/s/ Beth Ann Schenz, Esq.
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Attorney for Creditor

CERTIFICATE OF SERVICE

The undersigned certifies that on October 1, 2013, a true and correct copy of the foregoing Limited Objection to Confirmation of Debtor's Chapter 13 Plan was served via the Court's electronic case filing system on the following who are listed on the Court's Electronic Mail Notice List:

David E Butz, Esq., Attorney for Debtor, at dbutz@kwgd.com

Frederic P Schwieg, Esq., Attorney for Debtor, at fschwieg@schwieglaw.com

Maria D. Giannirakis, Esq., Attorney for United States Trustee, at maria.d.giannirakis@usdoj.gov

Amy Good, Esq., Attorney for United States Trustee, at amy.l.good@usdoj.gov

And on the following by ordinary U.S. Mail on or about October 1, 2013 addressed to:

Christopher Frank Paxos, 7237 Brycewood Cir., North Canton, OH 44720, Debtor

/s/ Beth Ann Schenz, Esq.
Beth Ann Schenz #0074217